

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

**PENNY KENNEDY,  
RAYMOND KENNEDY  
Individually and as guardians  
and next friends of TREVOR KENNEDY,  
an infant under the age of eighteen**

**Plaintiffs,**

**v.**

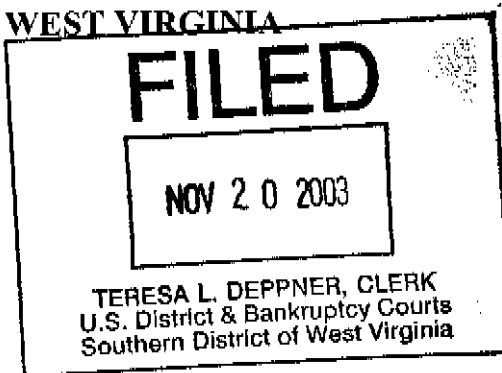
**CIVIL ACTION NO. 2:03-0175  
Charles Haden, II, Judge**

**UNITED STATES OF AMERICA;  
CHARLESTON AREA MEDICAL CENTER, INC.,  
d/b/a WOMEN AND CHILDREN'S HOSPITAL OF  
WEST VIRGINIA, d/b/a WOMEN AND CHILDREN'S  
HOSPITAL, d/b/a CAMC CHILDREN'S HOSPITAL,  
d/b/a CAMC WOMEN'S HOSPITAL, d/b/a CAMC  
WOMEN AND CHILDREN'S HOSPITAL,  
INPHYNET HOSPITAL SERVICES, INC.,  
a foreign corporation, doing business  
IN the state of West Virginia, and DR. GORDON J. GREEN,  
individually,**

**Defendants.**

**NOTICE OF DEPOSITIONS**

PLEASE BE ADVISED that, pursuant to the West Virginia Rules of Civil Procedure, on the 16<sup>th</sup> day of January, 2004, the undersigned will take the depositions of **Raymond Kennedy** and **Penny Kennedy**, commencing at 10:00 a.m., and will continue one after the other. These deposition will take place the offices of **Lambert & New**, located at **Rt. 52**,



**52, Main Street, Gilbert, WV**, before a person authorized by law to administer oaths, and will continue from hour to hour until completed. You are invited to appear to protect your interests.

**GORDON J. GREEN, M.D. AND  
INPHYNET HOSPITAL SERVICES, INC.**

By counsel.



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David L. Shuman WVSB No. 3389

Karen Tracy McElhinny WVSB No. 7517

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**PENNY KENNEDY,  
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**Plaintiffs,**

**v.**

**CIVIL ACTION NO. 2:03-0175  
Charles Haden, II, Judge**

**UNITED STATES OF AMERICA,  
COMMUNITY HEALTH FOUNDATION  
OF MAN, WEST VIRGINIA, INC., and  
DR. PLARIDEL TORDILLA, individually,  
CHARLESTON AREA MEDICAL CENTER, INC.,  
d/b/a WOMEN AND CHILDREN'S HOSPITAL OF  
WEST VIRGINIA, d/b/a WOMEN AND CHILDREN'S  
HOSPITAL, d/b/a CAMC CHILDREN'S HOSPITAL,  
d/b/a CAMC WOMEN'S HOSPITAL, d/b/a CAMC  
WOMEN AND CHILDREN'S HOSPITAL,  
INPHYNET HOSPITAL SERVICES, INC.,  
a foreign corporation, doing business  
IN the state of West Virginia, and DR. GORDON J. GREEN,  
individually,**

**Defendants.**

**CERTIFICATE OF SERVICE**


I, David L. Shuman/Karen Tracy McElhinny do here by certify that I served true and exact copies of the foregoing *Notice of Depositions* of Raymond Kennedy and Penny Kennedy on all counsel of record via the United States Postal Service in a stamped envelope addressed as follows:

Samuel A. Hrko, Esquire (7727)  
The Segal Law Firm  
810 Kanawha Boulevard, East  
Charleston WV 25301  
*Counsel for Plaintiffs*

Cheryl Eifert, Esquire (1111)  
Office of the General Counsel  
P.O. Box 3669  
Charleston, WV 25336  
*Counsel for Charleston Area Medical Center*

Stephen M. Horn, Esquire (1788)  
Assistant United States Attorney  
P.O. Box 1713  
Charleston, WV 25326  
*Counsel for United States*

Dated this 19<sup>th</sup> day of November, 2003.

  
\_\_\_\_\_  
David L. Shuman, Esq. (WVSB 3389)  
Karen Tracy McElhinny, Esq. (WVSB #7517)